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9 *Attorney for Defendant Sebastian Paulin*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA

13 Plaintiff,

14 vs.

15 SEBASTIAN M. PAULIN, M.D., et al.

16 Defendants.

CASE NO.: 2:11-cr-00381-JCM-GWF-1

STIPULATION TO RETURN PASSPORT

17 IT IS HEREBY STIPULATED AND AGREED by and between Defendant SEBASTIAN
18 M. PAULIN, M.D. by and through CJA Appointed Counsel William H. Gamage, Esq. and the United
19 States of America, by its counsel, DANIEL G. BOGDEN, United States Attorney and Cristina
20 Silva, Assistant U.S. Attorney, that the passport currently in the possession of US Pretrial Services
21 be returned to Defendant SEBASTIAN M. PAULIN, M.D. through his counsel William H. Gamage.

22 This Stipulation is entered into for the following reasons:

23 1. On or about December 14, 2015, Defendant PAULIN was sentenced to a term of 24
24 months per count to run concurrent based upon the judgment of this Court. Dkt. No. 151.
25 Defendant PAULIN is currently housed at Springfield Medical Center Federal Prison in
26 Springfield, MO with an expected release date of December 2017.

27 2. US Pretrial Services has been in possession of Defendant PAULIN's passport based
28 upon the terms of his pretrial supervision for the purposes of restricting travel. Pretrial Services
has a general policy of returning passport to the issuing agency unless ordered to return them by

1 this Court. Defendant Paulin met all terms of pretrial release and complied with all requirements of
 2 this Court regarding surrendering at Terminal Island FCI.

3 3. Defendant PAULIN needs his passport to get a new Social Security Card so that he
 4 can obtain medical records and other documents in support of a Petition for Compassionate
 5 Release. Defendant Counsel and his daughter are assisting him with this process.

6 4. Based upon the above and foregoing, Counsel submit that good cause appearing
 7 that the Court issue an Order allowing Pretrial Services to return Defendant PAULIN's passport to
 8 him through his attorney, William Gamage.
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10 Dated this 3rd day of October, 2016

Dated this 3rd day of October, 2016

11 **GAMAGE & GAMAGE**

DANIEL G. BOGDEN, U.S. Attorney

12 **/s/ William H Gamage, Esq.**

/s/ Cristina Silva, Esq.


13 _____
 14 William H. Gamage, Esq.

Attorney for Defendant Sebastian Paulin, MD

13 _____
 14 Cristina Silva, Esq.

Attorney for United States of America

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 18 IT IS SO ORDERED October 11, 2016.

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 21 _____
 22 UNITED STATES DISTRICT COURT JUDGE
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